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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

STEVE RABIN and JOHN CHAPMAN,
on behalf of themselves, and all others
similarly situated,

Plaintiffs,

v.

PRICEWATERHOUSECOOPERS LLP,

Defendant.

Case No. 16-cv-02276-JST

**STIPULATION AND ~~PROPOSED~~ ORDER
RE JOINT LETTER BRIEF ON DATA
DISCOVERY**

Hon. Judge Jon S. Tigar

1 Plaintiffs Steve Rabin and John Chapman (“Plaintiffs”) and Defendant
2 PricewaterhouseCoopers LLP (“PwC”) (collectively, “the Parties”) hereby stipulate and agree as
3 follows:

4 WHEREAS, on February 16, 2017, Plaintiffs and PricewaterhouseCoopers LLP
5 participated in a telephonic hearing with the Court regarding ongoing discovery disputes;

6 WHEREAS, the Court’s Minute Order, ECF No. 72, instructed the Parties, among other
7 things, to submit a joint letter brief by March 3, 2017 concerning the Parties’ dispute regarding
8 Plaintiffs’ request for production of data from PwC;

9 WHEREAS, because one argument asserted by PwC relates to the burden entailed in
10 production of these data, the Parties believe that the briefing will be more useful to the Court after
11 Plaintiffs have taken a deposition of PwC’s corporate designee regarding certain topics related to
12 the SourceOne database system, which houses information regarding applicants, including the
13 issue of burden of responding to Plaintiffs’ request for data fields;

14 WHEREAS, the Parties have scheduled the deposition for March 15;

15 WHEREAS, Plaintiffs have agreed not to seek leave, prior to the deposition, to extend the
16 deposition beyond seven hours;

17 WHEREAS, the Parties will exchange draft text of the joint letter brief after that
18 deposition, under the following schedule:

19 Wednesday, March 22: Plaintiffs provide draft text to PwC

20 Wednesday, March 29: PwC provides draft text to Plaintiffs

21 Wednesday, April 5: The Parties file their joint letter with the Court

22 WHEREAS, because of the complexity of the issues involved, the Parties request that the
23 page limit be extended to a total of ten pages, with each side allowed at most five pages.

24 THEREFORE, IT IS HEREBY STIPULATED that:

- 25 • the Parties will submit a joint letter brief regarding Plaintiffs’ request for data
26 discovery by April 5, 2017; and
- the page limit is extended to ten pages, with at most five pages allocated per party.

Respectfully submitted,

Dated: March 2, 2017

By: /s/ Jahan C. Sagafi
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*Counsel for Plaintiffs and Proposed Class and
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1 Dated: March 2, 2017

By: /s/ Gabor Balassa
Gabor Balassa

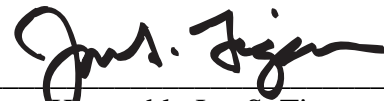
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22 *Attorneys for Defendant*

1 **PURSUANT TO THE STIPULATION, IT IS SO ORDERED.**

2
3
4 Date: March 7, 2017



Honorable Jon S. Tigar
United States District Judge

ATTESTATION OF SIGNATURE

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the other signatory above.

Dated: March 2, 2017

OUTTEN & GOLDEN LLP

By: /s/ Jahan C. Sagafi

Jahan C. Sagafi

Attorneys for Plaintiffs